

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Jackson Mahaffy; Flora Mahaffy; Daniel Nelson; and Paul Von Arx,

Plaintiffs,

Case File No.: 08-4992 (JMR/SRN)

V.

Robert J. Kroll, Wallace M. Krueger,  
Christopher J. Bennett, Aaron C. Hanson all  
acting in their individual capacities as Minneapolis  
Police Officers John Does Nos. 1-8, acting in their  
individual capacities as Minneapolis Police Officers,  
and the City of Minneapolis,

## Defendants.

**AFFIDAVIT OF C.  
LYNNE FUNDINGSLAND  
IN OPPOSITION TO  
PLAINTIFFS' MOTION  
TO AMEND THE  
COMPLAINT**

Your Affiant, being duly sworn under oath, deposes and states as follows:

1. Affiant is an Assistant City Attorney for the City of Minneapolis.
2. In that capacity, she is assigned to represent the City of Minneapolis and defendants Hanson and Bennett in the above-entitled matter.
3. Attached hereto as Exhibit A is a true and correct copy of excerpts of the deposition of Jackson Mahaffy given in the above-entitled matter.
4. Attached hereto as Exhibit B are true and correct copies of excerpts of the deposition of Flora Mahaffy given in the above-entitled matter.

5. Attached hereto as Exhibit C is a true and correct copy of the Minneapolis Police CAPRS report and statements, CCN-04-115690, supplied to Defendants by Plaintiffs' in their Rule 26(a) Disclosures.

6. Attached hereto as Exhibit D is a true and correct copy of Defendants City of Minneapolis, Hanson and Bennett's Rule 26(a) Disclosures dated December 15, 2008.

7. Attached hereto as Exhibit E is a true and correct copy of Defendants City of Minneapolis, Hanson and Bennett's Rule 26(a) Disclosures (First Amended) dated January 29, 2009.

8. Attached hereto as Exhibit F is a true and correct copy of Defendants City of Minneapolis, Hanson and Bennett's Rule 26(a) Disclosures (First Amended, Corrected) dated February 9, 2009.

Subscribed and sworn to  
before me this 2<sup>nd</sup> day  
of April, 2009

s/ C. Lynne Fundingsland

s/ Darla J. Boggs  
Notary Public  
My Commission expires: